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ROY ROMER
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Interim Executive Director

February 20, 1992

Mr. Martin Hestmark
U. S. Environmental Protection Agency
Region VIII
999 18th Street, Suite 500, 8WM-C
Denver, Colorado 80202-2405

RE: Technical Memorandum 1 - Revisions to Final Phase I RFI/RI Workplan for Walnut Creek Priority Drainage (Operable Unit No. 6), U. S. Department of Energy, ROCKY FLATS PLANT, Golden, Colorado, December, 1991.

Dear Mr. Hestmark,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division) has reviewed the subject document submitted by DOE and prime contractor, EG&G.

Based on our review, the Division recommends approval of the work plan. Although DOE continues to presume that a Phase II is inevitable, the work plan is adequate as a first step in the RFI/RI process provided subsequent steps, if any, are conducted within the IAG specified time frame and included in the Phase I RFI/RI Report scheduled for submission in August 1993.

The Division's comments are attached. We suggest that the changes represented by Technical Memorandum 1, and any changes resulting from these comments, be physically incorporated into the final work plan dated September, 1991. Upon final approval of the work plan, Technical Memorandum 1 should be rescinded.

The Division further recommends that DOE be permitted to proceed immediately with work plan contracting and implementation. However, DOE must justify and clarify its proposed surface soil sampling techniques to avoid the collection of potentially unacceptable data. This issue is discussed under comments to Section 7.2.1. The remainder of our comments can be easily addressed before work begins.

If you have any questions concerning this subject, please contact Harlen Ainscough of my staff at 331-4977.

Sincerely,

Gary W. Baughman
Unit Leader, Hazardous Waste Facilities
Hazardous Materials and Waste Management Division

Attachment

cc: Daniel S. Miller, AGO
Bonnie Lavelle, EPA
Barbara Barry, RFPD

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ADMIN RECORD

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